

217/782-2113

LIFETIME OPERATING PERMIT
SOLVENT CLEANING MACHINE - NESHA SOURCE

PERMITTEE

Billet Specialties, Inc.
Attn: Ms. Jill Sparacio, Dir. of Operations
500 Shawmut Avenue
LaGrange, Illinois 60525

Application No.: 02060012

I.D. No.: 031153ACB

Applicant's Designation:

Date Received: June 7, 2002

Subject: MSR480 Vapor Degreaser

Date Issued: July 15, 2002

Operating Permit Expiration

Date: See Condition 1.

Location: 500 Shawmut Avenue, LaGrange

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

An Open Top Bath Vapor Degreaser

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This operating permit is effective only if the Permittee has complied with all standard conditions of the construction permit.
 - b. Operation of the emission units included in this permit shall not begin until all associated air pollution control equipment has been constructed and is operational.
 - c. This operating permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
 - d. This permit shall terminate if it is withdrawn or is superseded by a revised permit.
- 2a. The solvent cleaning machine(s) are subject to 40 CFR part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning. The Illinois EPA is administering this regulation in Illinois on behalf of the United States EPA under a delegation agreement. The United States EPA issued this final rule on December 2, 1994.
 - b. The Permittee must be in compliance with 40 CFR Part 63, Subpart T - National Emissions Standards for Halogenated Solvent Cleaning on or before December 2, 1994 or immediately upon startup whichever is later.
- 3a. Solvent usage shall not exceed the following limits:

Solvent Usage
(Lb/Month) (Ton/Year)

540	2.7
-----	-----

Organic Material Emissions
(Lb/Month) (Ton/Year)

540	2.7
-----	-----

These limits are based on maximum solvent usage (trichloroethylene), operating hours and determined by material balance.

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- c. The Permittee shall use only trichloroethylene as solvent.
- 4a. For determination of compliance with the limits of this permit, solvent usage shall be determined by the following equation:

$$U = V - (W \times P)$$

Where:

U = Solvent usage for compliance determinations (gallons).

V = Virgin solvent^A added to the solvent cleaning machines (gallons), as determined by daily addition log sheets.

W = Waste solvent^B removed from the solvent cleaning machines and sent off-site for reclamation or disposal, as determined by monthly manifests.

P = Percent concentration of solvent in waste, as determined by analysis/testing^C.

^A For purposes of this permit, virgin solvent is defined as unused solvent.

^B For purposes of this permit, waste solvent is defined as used solvent.

^C The percent concentration of solvent in waste (P) shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

- b. Compliance with the monthly organic material emission limits shall be calculated using the solvent density as specified in the Material Safety Data Sheet, and the solvent usage (U) per month, as follows:

$$\begin{aligned} \text{Emissions} &= \text{Solvent Usage (U)} \times \text{Solvent Density} \\ (\text{lbs/month}) &= (\text{gallon/month}) \times (\text{lbs/gallon}) \end{aligned}$$

- 5. Each solvent cleaning machine must meet the following base design requirements, pursuant to 40 CFR, Part 63.463.
 - a. Each solvent cleaning machine must be equipped with an idling or downtime mode cover that completely covers the machine openings. The cover must be periodically inspected to ensure that it remains free of cracks, holes, and other defects. The cover must be closed at all times except during the cleaning, solvent removal, maintenance and monitoring of the degreasers.

- b. A freeboard ratio of 0.75 or greater must be maintained for each solvent cleaning machine.
 - c. Each solvent cleaning machine must have an automated parts handling system that handles parts from initial loading to removal of cleaned parts. If the Permittee wants to use manual hoist, the Permittee must demonstrate to the Illinois EPA that the hoist can never exceed 11 feet per minute.
 - d. Each solvent cleaning machine must be equipped with a liquid and vapor level control device(s) that shuts off the sump heat if the sump liquid level drops to the sump heater coils or the vapor level rises above the height of the primary condenser and such device(s) must be operational at all times.
 - e. Each solvent cleaning machine must be equipped with a primary condenser to provide continuous condensation or rising solvent vapors and to create a controlled vapor zone.
 - f. Each solvent cleaning machine with lip exhaust control must be controlled by a carbon adsorption unit.
6. The Permittee shall comply with the following work and operational practice, requirements and post in the work place a one page summary of work practices, pursuant to 40 CFR Part 63.463(d).
- a. Conduct maintenance as per manufacturer's recommendation to ensure that each solvent cleaning machine works properly. Any alternative maintenance practice must be approved by the USEPA.
 - b. Each solvent cleaning machine shall be covered to minimize air disturbances in the machine and the room at all times except during the cleaning, removal of solvent, maintenance and monitoring. If a cover cannot be used, air disturbances shall be controlled by Reduced Room Draft. Room draft shall not exceed 50 feet/minute.
 - c.
 - i. A speed of 3 feet/minute or less shall be maintained between entry and removal of parts basket or parts.
 - or
 - ii. Parts basket or parts size shall be less or equal to 50% of the solvent air interface area.
 - d. If cleaning operation involves spraying, spraying must be performed within the vapor zone (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - e. The Permittee must ensure that parts or parts basket are positioned so that solvent drains freely and parts basket or parts are not removed from the machine until parts are clean and solvent dripping has stopped.

- f. During the startup, the Permittee must turn on the primary condenser prior to turning on the sump pump and during shutdown, turn off the sump heater prior to turning off the primary condenser.
 - g. The Permittee must add and remove solvent with leak-proof couplings. The end of the pipe or hose introducing or withdrawing the solvent be located beneath the liquid solvent surface (i.e., submerged filling) in the sump.
 - h. The Permittee must collect and store the waste solvent, still bottoms, and sump bottoms in a closed container. Absorbent materials such as sponges, fabric, wood, and paper products shall not be cleaned.
 - i. Each operator of a solvent cleaning operation must be ready to take and pass an Operator Test at any time during the normal operation of the plant.
7. Each machine must meet the following control combination (Dwell and Freeboard Refrigeration) requirements, pursuant to 40 CFR Part 63.463:
- a. For Freeboard Refrigeration Device (FRD), chilled air blanket temperature at the center of the air blanket shall not exceed 30 percent of the solvents boiling point.
 - i. The temperature measurements must be conducted on weekly basis at the center of the air blanket above the vapor zone during the idling mode. The temperature measurements can be taken by attaching a thermometer or a thermocouple to the parts basket or hoist hook and lowering it into the machine so that it is in the center of the air blanket above the vapor zone.
 - b.
 - i. The Permittee shall determine the dwell time for parts to be cleaned. The dwell time is determined as follows:
 - A. Using a stopwatch, measure the amount of time takes for the parts or parts baskets to cease dripping once placed in the vapor zone. This is the primary cleaning time.
 - B. The dwell time shall be greater than or equal to 35% of the primary cleaning time.
 - ii. The Permittee shall ensure that parts are held in the freeboard area above the vapor zone for the determined dwell time. A monthly measurement of the actual dwell time shall be conducted.
 - iii. Record dwell time determination in second and time measurement calculations for life time.

- 8a. The Permittee shall comply with the following monitoring procedures requirements, pursuant to 40 CFR Part 63.466.
- i. The Permittee shall conduct monitoring and record the results on a weekly basis for Free Board Refrigeration Device, pursuant to 40 CFR Part 63.466(a)(1). A thermometer or thermo couple shall be used to measure the temperature at the center of the air blanket during the idling mode.
 - ii. The Permittee shall conduct monitoring and record the results on a monthly basis for the dwell, pursuant to 40 CFR Part 63.466(b)(2). The Permittee shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.
- b. The Permittee shall comply with the following monitoring procedures, pursuant to 40 CFR Part 63.466(c).
- i. The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - ii. The monitoring shall be conducted monthly. If after the first year no exceedances of the hoist speed are measured the Permittee may begin monitoring the hoist speed quarterly.
 - iii. If an exceedance of the hoist speed occurs during quarterly monitoring the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
 - iv. If the Permittee can demonstrate to the Illinois EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 11 feet per minute, the required monitoring frequency is quarterly, including during the first year of compliance.
- 9a. The Permittee shall retain the following records on paper or computer disk for the lifetime of the solvent cleaning machine, pursuant to 40 CFR Part 63.467(a):
- i. An owners manual or a written maintenance and operating procedure for each machine and each piece of control equipment.
 - ii. The installation date of each machine. If installation date isn't available, a letter certifying that machine was installed prior to or on or after November 29, 1993, to determine compliance option for existing or new source.
 - iii. Records of the halogenated HAP solvent content of each solvent used in each solvent cleaning machine.

- iv. Record of the test to determine an appropriate dwell time for each part or parts basket.
- b. The Permittee shall retain the following records in electronic or written form for a period of 5 years, pursuant to 40 CFR Part 63.467(b).
 - i. The results of control device monitoring required under 40 CFR Part 63.466.
 - ii. The Permittee shall keep the weekly freeboard air temperature measurements.
 - iii. Record of dwell time determination in second and monthly actual dwell time determination calculation.
 - iv. Estimates of annual solvent consumption for each solvent cleaning machine.
- 10. The Permittee shall comply with the following reporting requirements, pursuant to 40 CFR Part 63.468:
 - a. An initial statement of compliance report demonstrating each machine is in compliance must be submitted no later than 150 days after startup. The initial compliance report shall include the following:
 - i. Name and address.
 - ii. Facility location address.
 - iii. A list of control equipment (i.e., FRD, RRD) used on each machine to comply with the rule.
 - iv. For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
 - b. An annual compliance report must be submitted by February 1, of the year following the year the report covers. The compliance report shall include the following:
 - i. A statement, signed by the owner or operator or someone designate, stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required by 40 CFR 63.463(d)(10)."
 - ii. Solvent consumption and HAP emissions for each machine in lb/month and ton/year, for the reporting period.

- c. An exceedance report shall be submitted every 6 months if there is not an exceedance, and every 3 months if there is an exceedance. If an exceedance did not occur the report would consist of a statement certifying that there were no exceedances. The frequency of the exceedance report will increase to quarterly after an exceedance occurs. The quarterly exceedance report shall include the following:
 - i. Information on the actions taken to comply with 40 CFR Part 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - iii. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
 - d. The Permittee shall submit an exceedance report within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
 - e. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least 5 years, unless specifically stated in the permit, from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in a computer shall be cable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
12. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report

shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

14. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
 - a. An increase in emissions above the amount the emission unit or the source is permitted to emit;
 - b. A modification;
 - c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or
 - d. A change in ownership, company name, or address, so that the application or existing permit is not longer accurate.

It should be noted that the machining equipment is exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(aa).

If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:TNE:jar

cc: Region 1
Illinois EPA, Compliance Section
Lotus Notes